

UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF NEW HAMPSHIRE

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Kevin Rocheville

v.

Thomas Goulden,  
Matthew Keenlside,  
Allison Caprigno, and  
Town of Pelham, NH

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Civil Action No. 19-CV-01169-AJ

**AFFIDAVIT OF THOMAS GOULDEN**

NOW COMES Thomas Goulden being duly sworn on oath, depose and state as follows:

1. I am over the age of 18 and am of sound mind.
2. I served in the military from 1979 to 1984, including time as a military police officer.
3. After leaving the service I worked a variety of jobs, including in loss prevention specialist and for some time at a video rental store in Nashua, that latter in the 1980's.
4. During that time, Cheryl Bordeleau was also an employee of the video store, although we did not generally work together.
5. In 1994 I began a career in civil law enforcement with the Town of Brookline.
6. I attended the New Hampshire Police Academy through Brookline and became Chief of Police there in May 1997.
7. In May 2010 I left Brookline and joined the Hillsborough County Sherriff's Department, where I worked until approximately August 2011.
8. In September 2011 I began working at the Pelham Police Department, where I was a fulltime officer until August 2014.

9. I had my hair cut from time to time by Ms. Bordeleau while in Pelham.

10. I also saw Ms. Bordeleau from time to time in town while I worked in Pelham, during which time she occasionally sought my advice regarding various legal issues.

11. I did not have an affair or other sexual relationship with Ms. Bordeleau.

12. In August 2014 I took a position as Chief of Police in Shirley, Massachusetts.

13. Although I stayed on the Pelham roster for a few months as a parttime officer, I resigned in January 2015. I did not work in Pelham again after that.

14. I never stopped Plaintiff or administered sobriety tests to him, much less push him during any such test.

15. I did not make any threats against Plaintiff or orchestrate to have other officers follow him.

16. I did not enter into any agreement, express or implied, to have officers harass, arrest, or prosecute Plaintiff.

FURTHER THE AFFIANT SAYETH NOT.

Dated: July 21, 2021

/s/ Thomas Goulden  
Thomas Goulden

STATE OF NEW HAMPSHIRE  
COUNTY OF

Subscribed and sworn to before me this 21<sup>st</sup> day of July, 2021.

/s/ John Goy  
~~Notary Public~~ Justice of the Peace  
Commission expires: \_\_\_\_\_